

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF **BRONX**

-----X
CARIDAD RIVERA,

Plaintiff,

-against-

PETER PAN BUS LINES, INC. and GEORGE L. SCHNEIDER,

Defendants.
-----X

Plaintiff, complaining of the defendants herein by her attorneys,

HARMON, LINDER & ROGOWSKY, ESQS., respectfully sets forth and
alleges, as follows:

AS AND FOR A CAUSE OF ACTION

ON BEHALF OF CARIDAD RIVERA

1. That at the times of the commencement of this action plaintiff was a resident of the County of **BRONX**, State of New York.
2. That at all times herein , **PARK TRANSPORTATION, INC.**, was a corporation authorized to do business in the State of Illinois.
3. That at all times herein mentioned, **PARK TRANSPORTATION, INC.**, was the owner of a vehicle bearing registration number **P842819**, State of Illinois.

VERIFIED COMPLAINT

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Ad 4/6/18

4. That at all times herein mentioned , THADDUS L. HAMMOND, was the operator of a vehicle bearing registration number P842819, State of Illinois.

5. That at all times herein mentioned , THADDUS L. HAMMOND, was in physical charge, operation, management and control of the aforesaid vehicle owned by the , PARK TRANSPORTATION, INC., with the knowledge, consent, and permission, either express or implied of the owner thereof.

6. That at all times herein mentioned defendant, PETER PAN BUS LINES, INC. was a corporation duly organized and existing under and by virtue of the State of Massachusetts.

7. That at all times herein mentioned defendant, PETER PAN BUS LINES, INC. was a corporation duly organized and existing under and by virtue of the State of New York.

8. That at all times herein mentioned defendant, PETER PAN BUS LINES, INC. was and still is a business entity licensed to transact business in the New York.

9. That at all times herein mentioned defendant, PETER PAN BUS LINES, INC. was and still is a business entity transacting business in the New York.

10. That at all times herein mentioned defendant, PETER PAN BUS LINES, INC. owns , uses, or possesses real property in the State of New York.

11. That at all times herein mentioned defendant, PETER PAN BUS LINES, INC. owns , uses, or possesses property in the State of New York.

12. That at all times herein mentioned defendant, PETER PAN BUS LINES, INC. maintains offices in the State of New York.

13. That at all times herein mentioned defendant, PETER PAN BUS LINES, INC. was the owner of an automobile bearing registration number 91236, State of Massachusetts.

14. That at all times herein mentioned defendant, **GEORGE L. SCHNEIDER**, was the operator of an automobile bearing registration number **91236, State of Massachusetts**.

15. That at all times herein mentioned defendant, **GEORGE L. SCHNEIDER**, was in physical charge, operation, management and control of the aforesaid vehicle owned by the defendant, **PETER PAN BUS LINES, INC.**, with the knowledge, consent, and permission, either express or implied of the defendant owner thereof.

16. That at all times herein mentioned plaintiff, **CARIDAD RIVERA**, was a passenger of the aforesaid motor vehicle bearing registration number **91236, State of Massachusetts**.

17. That on the **Fifteenth day of September, 2017**, at approximately **5:36 p.m.**, the aforesaid vehicles came into contact with each other on **I-295**, at or near its intersection with **S/B S/O Delaware Memorial Bridge Toll Plaza (on the right shoulder)**, a public street and thoroughfare, in the County of **New Castle**, State of **Delaware**.

18. The defendants so carelessly and negligently operated their aforesaid respective vehicles so as to cause the aforesaid contact.

19. That as a result of the foregoing, this plaintiff was caused to and did sustain severe and serious injuries and was required to seek and obtain medical care and attention in an effort to cure and alleviate same and, upon information and belief, will be compelled to do so in the future.

20. That the aforesaid occurrence and the injuries sustained by this plaintiff were caused by the negligence of the defendants.

21. That this plaintiff has sustained a serious injury as the same is defined in Subdivision "d" of Section 5102 of the Insurance Law of the State of New York 22. This action falls within one or more of the exceptions set forth in CPLR section 1602.

23. That by reason of the foregoing, plaintiff, **CARIDAD RIVERA**, has been damaged in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction.

WHEREFORE, plaintiff, CARIDAD RIVERA, demands judgement against the defendants in the Cause of Action in an amount which exceeds the jurisdictional limits of all lower courts that would otherwise have jurisdiction; all together with the costs and disbursements of this action.

Dated: New York, NY
April 6, 2018

A handwritten signature, likely 'MJL', enclosed within a hand-drawn oval.

HARMON, LINDER & ROGOWSKY, ESQS.
Attorney(s) for Plaintiff(s)
3 Park Avenue, Suite 2300
New York, New York 10016
(212) 732-3665
MJL/mj

Mark J. Linder Esq.

Index No.

Year

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Defendants.

SUMMONS AND VERIFIED COMPLAINT

HARMON, LINDER & ROGOSWKY, ESQS.

Attorney for Plaintiff(s)
3 Park Avenue, Suite 2300
New York, NY 10016
(212) 732-3665 Phone
(212) 732-1462 Facsimile

To:
Attorney(s) for Defendant

Service of a copy of the within Summons and Complaint is hereby admitted.

Dated:

Attorney(s) for

PLEASE TAKE NOTICE

☐ Notice of Entry that the within is a (certified) true copy of a
entered in the office of the clerk of the within named Court on

☐ Notice of Settlement
that an order of which the within is a true copy will be presented for settlement to the
Hon. _____, one of the judges of the within named Court, at _____,
on _____.

Dated:

Yours, etc.
Harmon, Linder & Rogowsky
Attorneys for Plaintiff
3 Park Avenue, Suite 2300
New York, NY 10016
(212) 732-3665